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6 | Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

11 RUSSELL E. BURNS, et al.

Case No. C13-5886 SBA

12 | Plaintiffs.

**NOTICE OF SETTLEMENT AND
PLAINTIFFS' REQUEST TO VACATE, or
in the alternative, CONTINUE CASE
MANAGEMENT CONFERENCE;
[PROPOSED] ORDER THEREON**

14 TITAN DVBE, INC., a California Corporation;
WILLIAM SCHROYER, an Individual.

Date: Thursday, January 29, 2015

Date: Thursday
Time: 2:30 p.m.

Time: 2:30 p.m.
Ctrm: 1, 4th Floor
1301 Clay Street
Oakland, California

Judge: The Honorable Saundra B. Armstrong

19 Plaintiffs respectfully request that the Case Management Conference scheduled for January
20 29, 2015, at 2:30 p.m., be vacated, or in the alternative, continued for approximately sixty (60)
21 days. Good cause exists as follows:

22 1. As the Court's records will reflect, this action was filed on December 19, 2013 to
23 compel Defendants to comply with the terms of their Collective Bargaining Agreement.

24 2. The parties agreed to participate in mediation, and filed a Stipulation Selecting
25 ADR Process, Mediation, on October 9, 2014. [Dkt. #25].

26 3. On October 10, 2014, the Court issued an Order referring this matter to Mediation
27 to be completed within 90 days from October 10, 2014. [Dkt. #26].

1 4. On October 23, 2014, the parties requested a continuance to the Case Management
2 Conference to allow the parties sufficient time to participate in mediation. [Dkt. #27]. On October
3 27, 2014, the Court granted parties' request and the Case Management Conference was continued
4 to January 29, 2015. [Dkt. #28].

5. On January 13, 2015, the mediator filed a Certification of Mediation which reflects
6 that the matter was settled during several pre-session telephone calls. [Dkt. #30].

7 6. The parties will now work together to prepare a Judgment Pursuant to Stipulation
8 for amounts due by Defendants to Plaintiffs.

9 7. As this matter has been settled, there are no issues that need to be addressed by this
10 Court at the currently scheduled Case Management Conference. In the interest of conserving
11 costs, as well as the Court's time and resources, Plaintiffs' respectfully request that the Court
12 vacate, or in the alternative continue for approximately sixty (60) days, the currently scheduled
13 Case Management Conference, to allow the parties sufficient time to prepare a Judgment Pursuant
14 to Stipulation.

15 | Dated: January 15, 2015

**SALTZMAN & JOHNSON
LAW CORPORATION**

By: _____ /S/ _____
Michele R. Stafford
Attorneys for Plaintiffs

20 | IT IS SO ORDERED

21 Based on the foregoing, and GOOD CAUSE APPEARING, the currently set Case
22 Management Conference is hereby VACATED, or in the alternative, CONTINUED to
3/26/2015, at 2:45pm, and all related deadlines are extended accordingly.

24 | Date: 1/16/2015

Saundra B. Armstrong
THE HONORABLE SAUNDRA B. ARMSTRONG
UNITED STATES DISTRICT COURT